

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.<sup>1</sup>

PROMESA Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

Case No. 17-BK-4780-LTS

**INFORMATIVE MOTION OF THE AD HOC GROUP OF PREPA BONDHOLDERS,  
ASSURED GUARANTY CORP., ASSURED GUARANTY MUNICIPAL CORP., AND  
SYNCORA GUARANTEE, INC. RELATED TO THE EXPERT REPORTS OF  
DR. SUSAN TIERNEY AND THOMAS S. TERRY**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**To the Honorable United States District Court Judge Laura Taylor Swain:**

Pursuant to paragraphs 3 and 25 of the Court’s May 31, 2023 *Third Amended and Restated Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (the “Third Amended Procedures Order”) (ECF No. 3565), and paragraph 7 of the Plan Depository Protective Order, the Ad Hoc Group of PREPA Bondholders (“Ad Hoc Group”), Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (“Assured”), and Syncora Guarantee Inc. (“Syncora” and collectively, “Bondholders”), respectfully submit this informative motion submitting an unredacted copy of Dr. Susan Tierney’s Opening Expert Report, Dr. Susan Tierney’s Rebuttal Expert Report, and Thomas Terry’s Expert Rebuttal Report with the agreement of U.S. Bank National Association in its capacity as PREPA Bond Trustee.

1. Bondholders filed prior version of Dr. Tierney’s Opening Expert Report (ECF No. 3424-4); Dr. Tierney’s Rebuttal Expert Report (ECF No. 3503-3); and Thomas Terry’s Expert Rebuttal Report (ECF No. 3503-2) with information redacted that Bondholders believed relied on information the Oversight Board had marked confidential in the Plan Depository (ECF No. 3424-1).

2. At the time, the Bondholders did not file unredacted versions of these documents on the public docket in good faith compliance with Paragraph 25 of the *Amended and Restated Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (the “Amended Procedures Order”) (ECF No. 3305). We separately submitted unredacted versions of those documents to the Financial Oversight and Management Board of Puerto Rico (the “Oversight Board”) and the Court in accordance with the Amended Procedures Order.

3. Earlier today, and pursuant to Paragraph 7 of the Third Amended Procedures Order, Bondholders conferred with the Oversight Board, explaining that Bondholders did not view anything in these documents as meriting confidential treatment. The Oversight Board agreed.

**WHEREFORE** Bondholders respectfully request that the Court take notice of the foregoing.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

Dated: San Juan, Puerto Rico  
June 1, 2023

**TORO COLÓN MULLET P.S.C.**

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